



Department for  
**Social  
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# Social Housing **Reform Programme**



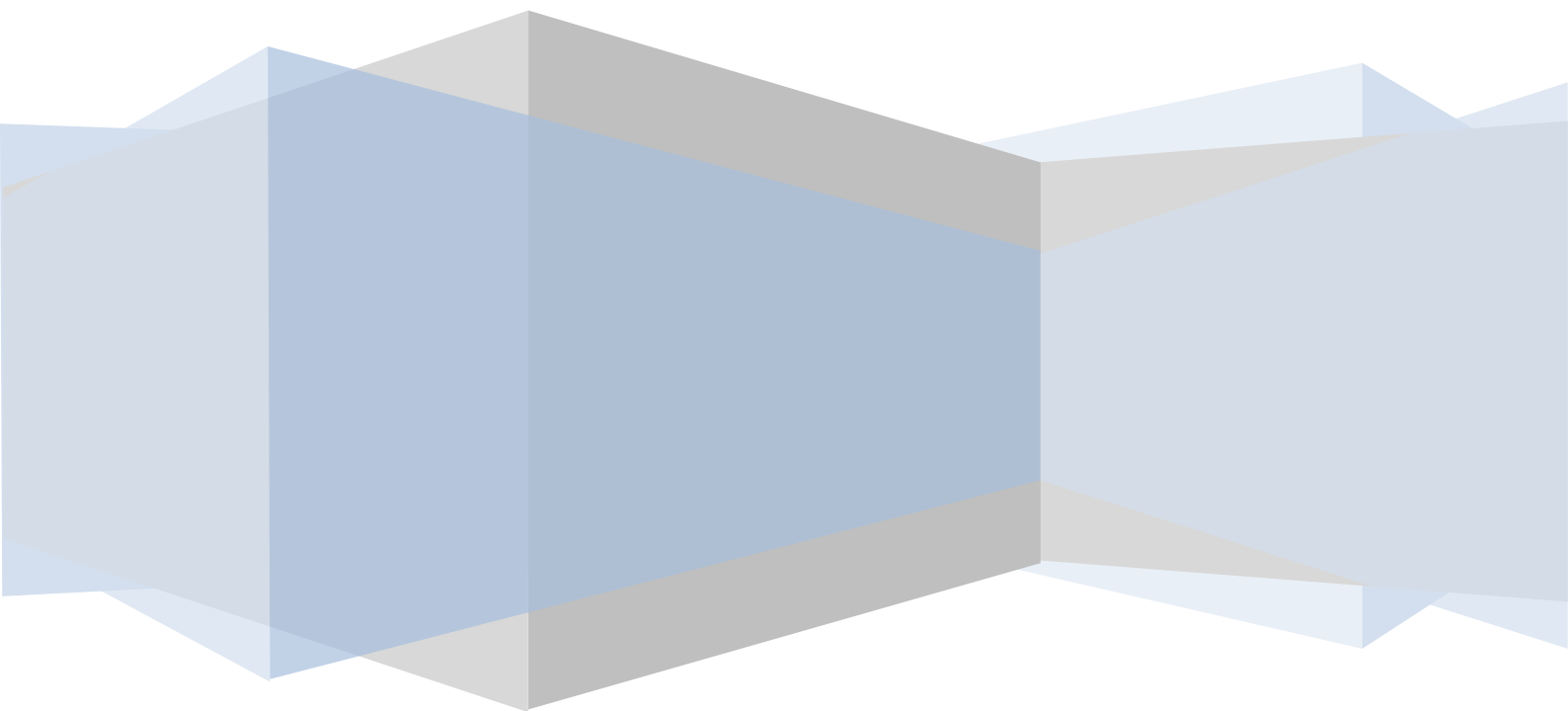
**TENANT PARTICIPATION STRATEGY CONSULTATION  
RESPONSE REPORT**

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# **A Tenant Participation Strategy for Northern Ireland: 2015 to 2020**

**Consultation Response Report**

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### ABOUT THIS DOCUMENT

This document reports the findings of the consultation on *A Tenant Participation Strategy for Northern Ireland: 2015 to 2020*. This was the first in a series of consultations as part of the Department for Social Development's (DSD) Social Housing Reform Programme (the Programme). This is the DSD's Response Report following analysis of respondents' feedback to the consultation.

## 1. INTRODUCTION

### BACKGROUND

The Programme was launched in January 2013 with a mandate from the Northern Ireland Executive, "to explore the potential for the reform of housing structures with a view to securing consensus on the way forward". The Programme's mandate was to look at:-

- **Structural reform** of the Northern Ireland Housing Executive (NIHE), including its landlord functions (the management of NIHE properties) and regional functions (the strategic roles covering all housing in Northern Ireland, whether private or social);
- **Policy reform** of social housing rent, tenant participation, local government engagement, the regulation and inspection of social housing and the housing functions of DSD.

The Programme's vision is to establish:-

"housing structures that support the provision of social and affordable homes, in thriving communities where people are proud to live".

Part of that vision considered how government should develop tenant engagement and participation so tenants consistently play an active role in shaping the social housing services they receive. Subsequently, *A Tenant Participation Strategy for Northern Ireland: 2015 to 2020* consultation was launched to gather stakeholder views on the proposals within the draft strategy.

The draft strategy acknowledged that there is already some good practice in terms of tenant engagement and participation in Northern Ireland, however, in comparison with some of the advances made in other parts of the UK, research highlighted that there are inconsistencies within the Northern Ireland housing sector and engagement and participation has developed in a piecemeal and patchwork way. As a result, tenant empowerment (where tenants actually take responsibility from social landlords for the social housing services they receive) has not developed in Northern Ireland. Therefore, an overarching contribution from government was needed and the draft strategy was developed based on this research and from pre-consultation feedback provided by stakeholders.

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## CONSULTATION PROCESS

The consultation period ran from 15th January 2015 to 8th April 2015. A consultation proforma was issued along with the document to aid feedback. There were six consultation questions and consultees were also invited to provide written feedback against each question in a free text box. The consultation was communicated widely by the Department using a variety of communications channels. The total audience reach (on-line & traditional communications channels) was 483,227. Further information can be found in **Appendix A**.

Three public events were also advertised, the first in Belfast, followed by an event in Londonderry, with the final one in Craigavon. In addition to these public events the team presented the consultation document to a further 19 groups. More than 500 tenants, their representatives and landlords attended these events. The majority of responses were received via the online survey questionnaire. A number of written responses were submitted by email from tenant representative groups and other local housing organisations and a few were received in hard copy format through the post. A total of 171 online responses were received as well as 35 from other organisations.

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## Findings

The individual responses as well as organisational responses were analysed following the end of the public consultation. A number of emerging themes were identified and many comments were general in nature rather than referenced to a specific consultation question. All responses and comments were considered. These have shaped the Response Report and detailed findings have been included in the document.

A high level overview of the feedback for each consultation question is provided below:-

### **Q1: How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?**

*Finding:* The majority of respondents (73%) favoured the development of a specific tenant participation strategy. There was also a strong view that simply having a strategy in place would not in itself suffice: the focus needs to be on outputs and demonstrating how tenants views are factored into the Social Housing Providers plans. Feedback also suggested that there needs to be an element of flexibility to accommodate the differences in organisations such as size and tenant requirements.

### **Q2: Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?**

*Finding:* Almost all respondents (93%) felt that the strategic approach was appropriate and fair. It was felt the 10 principles expected of Social Landlords laid a solid foundation for all organisations and will be crucial to introducing meaningful tenant participation while ensuring the necessary accountability.

**Q3: Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?**

*Finding:* A large majority of responses supported the establishment of an Independent Tenant Organisation and 87% showed support for an over-arching body. It was felt this would bring about a good level of consistency within the Northern Ireland social housing sector. Respondents highlighted the need for sharing best practice and delivering training and support. They felt this could lead to an improvement in the quality of tenant participation right across Northern Ireland. An overwhelming number of responses indicated that the skills and expertise are already held locally and good working relationships are currently in place, with many respondents making specific reference to Supporting Communities Northern Ireland (SCNI) which has worked in this area for some years. A view expressed repeatedly was that any new tenant support role could be integrated into existing processes.

**Q4: Is the regulatory standard clear and understandable?**

*Finding:* The majority of respondents (88%) felt the regulatory standard was clear and understandable however a small percentage of respondents (12%) felt the regulatory standard contained in the draft strategy was not entirely clear. The reason given was that the standard referred to 'associations' rather than 'social housing providers'. The strategy as a whole did make it clear that the proposals applied to all social housing providers, therefore, it was suggested that the standard is re-worded for inclusion in the final strategy.

**Q5: Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?**

*Finding:* Most respondents (77%) were in favour of the introduction of legislation to support tenant empowerment rights. However, the majority of responses provided a caveat, in that while it would be worthwhile to have the legislation in place due to the lengthy process involved, now may not be right time for Northern Ireland to take such a large step forward. It was repeatedly suggested that the focus should be on ensuring effective tenant participation is in place first before emerging upon tenant empowerment initiatives. Feedback highlighted that a number of local political issues, not relevant to other UK jurisdictions, would need to be considered before tenant empowerment could be introduced. Respondents were also adamant that if empowerment initiatives were introduced in Northern Ireland then strict controls would need to be enforced. The overall opinion was that this element of the strategy should be progressed with caution and the introduction of any empowerment initiatives should be longer-term, after tenant participation processes have had some time to bed-in.

## Q6: Do you agree with the findings in the Impact Assessment screening reports?

*Finding:* Nearly all respondents (92%) agreed with the findings in the Impact Assessment screening reports. It was felt that the introduction of a Tenant Participation Strategy was a very welcome proposal and would have a positive impact on all social housing tenants. A number of organisations felt the new strategy will fill a gap that previously existed in relation to tenant involvement in the housing services they receive. A small volume of responses suggested some further thought should be given to inserting references to legislation covering persons with disabilities.

### General

Other general feedback suggested clarification was needed on:-

- Tenant Advocate role;
- Housing Policy Panel role;
- Development of Guidance to accompany the strategy;
- Action taken if regulatory standard not met;
- Mechanism for participation by non tenants (e.g. other service users, homeless people etc.);
- Building on existing good practices.

It is planned that a Tenant Participation Action Plan will accompany the final version of the Strategy that will be published in the autumn. The Action Plan will detail the implementation activity including the timescales to deliver the strategy. The general comments provided by respondents will be addressed within the Action Plan.

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### Summary

Overall the feedback provided by respondents supported the proposed approach. The high volume of responses received from a diverse range of individuals as well as organisations from across the social housing sector provided a well balanced view and was valuable to the success of the exercise as a whole.

Respondents welcomed the introduction of a Tenant Participation Strategy. This view was expressed by tenants, their representatives and housing sector organisations alike. It was felt that, over the last number of years, there had been a gap in relation to tenants having a good level of input to housing services decisions that directly affect them. Therefore, the introduction of a strategy was considered to be a good news story right across the Northern Ireland social housing sector.

One of the main points stressed was that there needed to be sufficient regulation in place to ensure that a tick-box compliance process did not emerge. It was considered essential that the Regulator recognises the differences between organisations - realising that a one-size-fits-all approach would not be effective and an element of flexibility would need to be adopted. Respondents highlighted the need for Social Housing Providers to act upon the feedback gathered



from tenants and to build this information into organisational plans in order to provide a sufficient level of transparency for tenants.

It was also suggested that Social Housing Providers need to consider the community as a whole and seek to make continuous improvements for all residents and service users. Partnership working with other Agencies to improve areas was deemed essential.

There was a degree of mixed views in relation to tenant empowerment. The majority of respondents were in favour of tenant empowerment in the longer term but suggested that cautious progression would be necessary.

It is recognised that some lower level planning is required to deliver the various elements within the strategy. Therefore, the Action Plan that will be published alongside the strategy will detail the delivery plan over the five year period. Close engagement with relevant stakeholders will take place to develop and agree the Action Plan ahead of publication.

The Department appreciates the constructive input to this consultation by the Northern Ireland housing sector and is encouraged by the interest shown in contributing to a Tenant Participation Strategy that is designed to create a greater voice for all tenants regardless of their specific requirements or geographical location. Adherence to the strategy will be monitored through the consumer standard contained in the Regulatory Framework for Social Housing Providers in Northern Ireland.

## 2. ANALYSIS OF RESPONSES

### Introduction

This section of the document considers all the responses and provides an analysis of each question along with a commentary drawn not only from the online survey results but also from the written submissions and the feedback received from the 22 consultation events that took place during the consultation period.

A consultation document was drafted setting out the aims of the strategy and inviting comments from consultees on a number of areas.

Consultees were given the option of completing an online survey or submitting a response in writing. A copy of the questionnaire can be found at **Appendix B** and a list of consultees is provided at **Appendix C**. Details of those that submitted written responses are included at **Appendix D**.

A further document with the full responses, both written and from the online survey is available on request.

### QUESTION 1

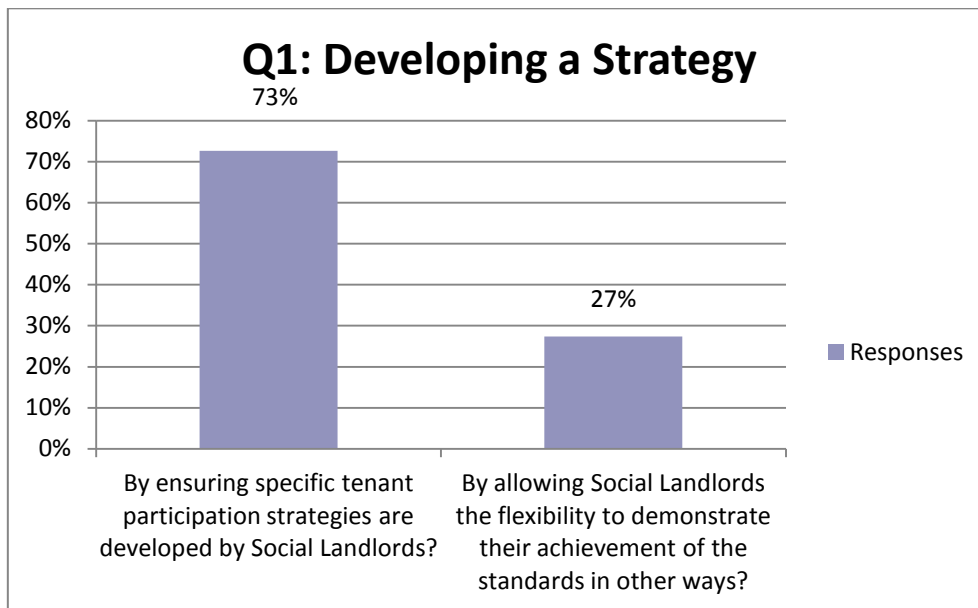
**How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?**

- **By ensuring specific tenant participation strategies are developed by Social Landlords**
- **By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways**

The majority of responses to this question, 73%, were in favour of specific strategies being developed. The rationale behind this was that respondents felt that, if this was not the case, tenants could not be protected and subsequently would be unable to determine exactly what level of service and participation their Social Landlord was expected to provide.

There were however a small number of respondents, 27%, who held the view that Social landlords should be given the flexibility to demonstrate how they achieved tenant participation by other means - the reason being that the large variation in size and resources between Housing Associations would allow each Social Landlord an opportunity to develop a strategy specific to their size and needs.

A number were also in favour of adopting a dual approach and felt that Social Landlords should be asked to provide a strategy but at the same time be allowed an opportunity to adopt their approach to participation to suit their client base.



These figures were further supported by the written submissions which reflected a desire for Social Landlords to develop and deliver a strategy for tenant participation and through benchmarking seek to improve on it in a way that is realistic and achievable.

A selection of comments from the responses submitted is shown below:

- It is important to have a common goal that all social housing providers adhere to. Make sure that Landlords have proper plans and see changes through. Tenants need to be involved, and evidence-based standards need to be shown and regulated across the board.
- In favour of developing a strategy as it demonstrates a commitment and ensures a two way process is in place.
- Yes to having the flexibility to develop individual approach - provides a clear signal to Social Landlords that it expects further strengthening of existing good practice and for all providers to meet minimum standards.
- Yes to both options - suggest a strategic approach in order to develop tailored strategies across all social landlords.

A common issue raised throughout the responses to this question was the need for the strategy to emphasise what action would be taken as a result of feedback gathered from tenants and service users, that it was not enough simply to have a mechanism in place to gather tenant views, and that measurable outcomes were required as opposed to a tick-box exercise. The Department is committed to making every effort to ensure that this tenant participation strategy is visible and accessible and that all Social Landlords firstly engage with their tenants and secondly provide an opportunity for their tenants to engage with them.

Ultimately the desired objective is for both parties to work together to inform and shape the housing services that the social landlord delivers to the benefit of the tenant. The regulator will

look for evidence from the social landlord of the participation they should encourage. The landlord will be asked to provide proof of the efforts they make to engage with their tenants and cite outcomes. It will not be a tick-box exercise. Controls will be factored in to the strategy to allow for review, and regulation will ensure that outputs and performance in the area of tenant participation are being assessed.

In summary feedback on this question demonstrates that the vast majority of respondents are content that the Department are applying the correct approach in relation to how they challenge the Social Landlord to increase the extent and effectiveness of tenant participation in Northern Ireland. By way of safeguards this process will be regulated and monitored on a continuous basis and if required adjustments made as necessary if issues arise.

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## QUESTION 2

Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair? (10 principles)

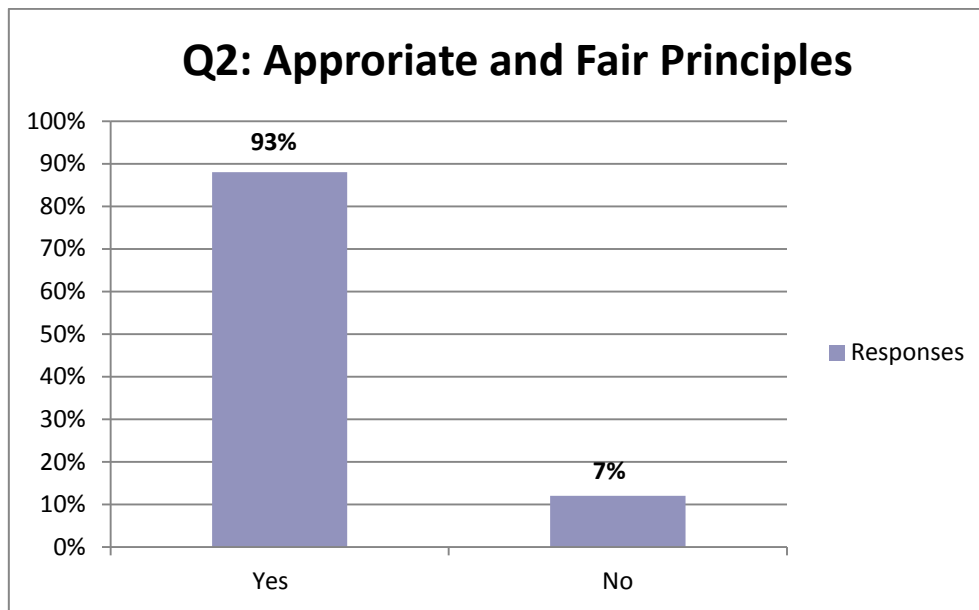
- Yes
- No

In this question respondents were asked to comment on the ten principles proposed for tenant participation. The overwhelming majority, 93%, were of the view that what the Department was expecting of a Social Landlord was appropriate and fair and that the ten principles being proposed was a satisfactory model to proceed with. In general the feeling was that the principles let both landlords and tenants see what is expected from each other. They are deemed to be a good template for a working structure that can always be added to, changed or amended. The opinion is that if all expectations can be met this would greatly benefit tenant participation within social housing.

Feedback received at the consultation events, and the written responses, were also in favour of this type of approach. A number of recurring themes emerged however that require further consideration;

1. The need for tenants to be at the forefront of the participation process and for them to find it easy to access information from their Social landlords – **Response;** the Department is fully supportive of this approach and the standard will provide for this.
2. The Department should provide funding to support Social landlords to deliver these participation activities – **Response;** the Department believes that social landlords should be responsible for developing tenant participation within their organizations.
3. There was a concern that Social landlords could use tenants to carry out some functions on a voluntary basis which they themselves are responsible for, in essence exploiting their good will and using tenants as cheap labour – **Response;** the Department would be strongly against this occurring. This is not what participation is about but rather to get Social landlords and tenants working **together** to develop participation activities and

opportunities, in an environment of mutual trust and understanding which has been developed between both parties.



Some of the comments submitted are outlined below:

- The Ten Principles for Tenant Participation are a solid foundation for any organisation committed to tenant involvement. They set the standard for effective tenant participation to be embedded in the culture of the organisation, as it should be.
- The 10 Golden Rules are very positive and absolutely preferable to the overregulation of activity that must be flexible and responsive to tenant needs.
- Believe that social landlords should be expected to adhere to the principles for tenant participation set out in the strategy. Social landlords should also be mindful that different tenants will want to participate at different levels and they should ensure that a range of participation opportunities exist.
- Welcome the recognition of the need to support tenant participation, through training, resources and staff time, in order to support and build the capacity of tenants to get involved.

To conclude, the department are of the opinion that the majority of those that responded to this question, or provided their opinion at the events, are content that we are applying the correct approach in relation to our ten key principles and that they are appropriate and fair to the landlord. As before the process will be ongoing and will be tested continuously and if required adjustments made as necessary if issues arise.

### QUESTION 3

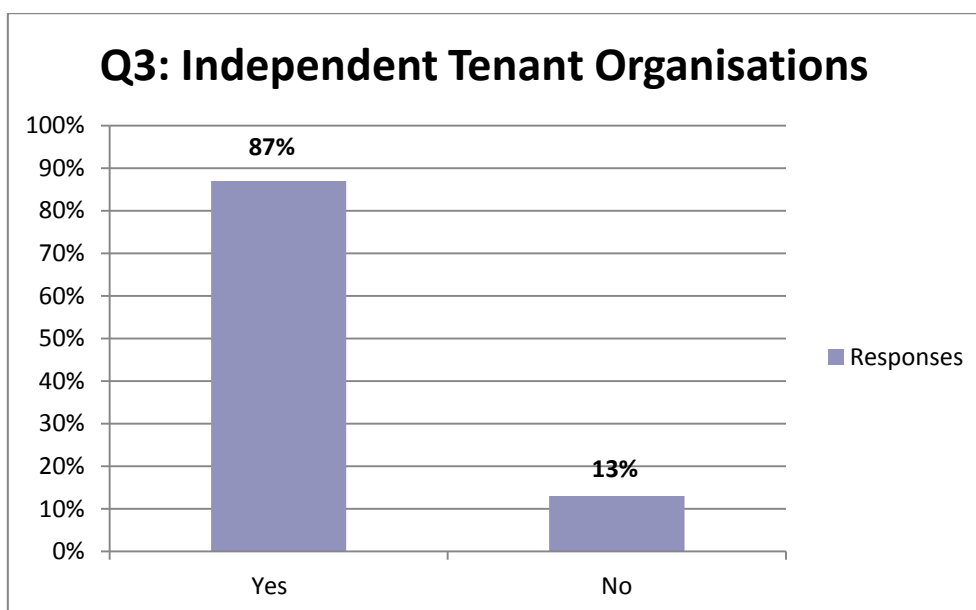
Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

- Yes
- No

In this question respondents were asked if they agreed if the department should support the development of an independent tenant support organisation for Northern Ireland. An overwhelming majority, 87%, were in favour of an independent tenant support organisation but the majority of these respondents highlighted the danger of overlapping with service providers already in situ who were already carrying out this work very effectively. They made the point that there was already evidence of good practice in place and that this could be jeopardised by a new organisation coming in an upsetting the status quo.

A small number of respondents, 13%, expressed different views on the subject. These ranged from a desire for tenants to have their own individual voice; some felt that an independent tenant support organisation was a waste of money, whilst others felt it was just another level of bureaucracy.

Positive feedback was also received from the consultations session and written responses, and again this was qualified – the suggestions included that the Department should expand and develop existing services as opposed to investing in a new organisation, and that Social landlords should fund or at least contribute to the costs for a new organisation. Others felt that a new organisation should ensure representation from the supported living sector, and that a tenant organisation was essential in order to guide tenants and provide independent advice.



A selection of comments relating to this question is outlined below:

- An independent tenant support body should be available to all social landlords and tenants. There is a need to support tenants, provide training and assist with sourcing funding opportunities for communities. There is also a need to offer a service to social landlords in regard to sharing best practice and information.
- An independent tenant support body would need to work on a local level – developing Tenant Associations, making them aware of their role, functions and the opportunities that they can avail of. The key thing in this process needs to be that the organisation develops participation on the basis of the needs and interests of tenants.
- It is important there is an Independent organisation to assist/provide service to all social tenants in an era of fairness and equality. All social tenants must be afforded equal opportunities in terms of engagement, training, advice etc.
- They need to be mindful of rural communities, create more of a presence and ensure proper investment in the rural sector.
- There is a need to create more than one organisation – there needs to be competition.
- Concern that a large multi-national organisation could become the independent tenant organisation whilst having no regard or understanding on local issues, thus squeezing out smaller organisations and resident associations who would not be in a position to mount any challenge.

Some respondents raised an issue in relation to others who are not tenants, for example homeless people, service users, people on the waiting list and the travelling community. The Department will continue to work with representatives of these groups and will work alongside statutory and voluntary organisations as well as the independent tenant support organisation, if and when established, to set in place processes to ensure engagement opportunities are made available to them also.

To summarise, the feedback submitted indicated that there was a desire to establish an independent tenant support organisation, albeit with concerns that need to be considered about the specific make up and the terms of reference. The Department is committed to working with stakeholders to develop independent tenant support and will make a strong case for government funds to support this. However the decision as to the identity of the organisation, or indeed if there will be more than one, has yet to be decided. This work will form part of an action plan which is in the process of being developed and along with other planned actions will be subject to further discussions with stakeholders.

#### QUESTION 4

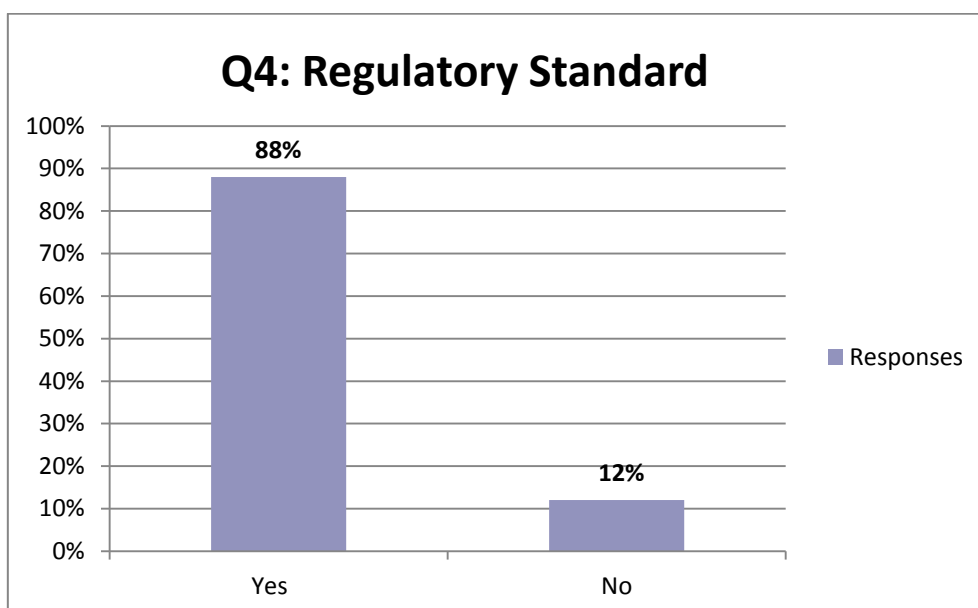
Is the regulatory standard clear and understandable?

- Yes
- No

In this question respondents were asked if they felt that the department had made the standard being proposed to regulate tenant participation clear and understandable. A high volume, 88%, answered yes to this question although these responses were predicated with various suggestions. A number asked for greater clarity and consistency with language in relation to some terminologies used in the strategy document, whilst some asked for provision of further examples to help them understand exactly what the department are proposing. We will look at these comments and where possible address these within the strategy document before it is finalised.

There was a similar trend from the consultation events and written responses with additional comments accompanying the high volume of 'Yes' responses. These included suggestions on how we could further develop the standard to ensure high quality services are delivered, and a desire to have the regulation properly monitored so that Social landlords do not simply go through the motions. Other requests were for consideration to be given to the Private rented sector, to provide incentives to encourage participation, to develop a charter, to create more of a presence and investment in rural communities, and ensure that there is two - way engagement for this to work. A number of respondents also queried the reference to "housing associations" rather than social housing providers in the standard.

A small number of respondents, 12%, answered 'no' as they felt that the language used was unclear or ambiguous whilst some felt it was too high a level and not pitched correctly.





Some of the comments submitted are outlined below;

- We believe the regulatory standards, set down in the consultation document, are clear and understandable.
- The standard is fine as a general statement but execution in practise will be an ongoing challenge.
- Landlord must demonstrate that the voice of the tenant is at the heart of its business.
- Yes. Good that it is included in Regulatory Framework. Regulator should be able to intervene. Mechanisms should ensure high quality services. Information should be available for tenants. Performance indicators should be included as should the comparison of performance data.
- No - felt matter was unclear - language was complex and difficult to understand - need more reference to tenant involvement - feel language is ambiguous - needs to be proactive with appropriate sanctions in place.

To summarise the departments' question on whether the regulatory standard is clear and understandable has been received very positively and the majority of respondents are in favour. In relation to the various comments and suggestions that were made these will be considered forthwith and where possible we will implement suggestions to try and address all the issues raised.

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#### QUESTION 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

- Yes
- No

This question generated a lot of debate, some of it quite emotive, and there were a wide range of views and comments submitted. The returns showed that a high percentage of respondents, 77%, answered 'yes' to this question but the majority of these responses also provided various statements and suggestions that broadly speaking were cautious in nature.

These statements were varied and incorporated a number of issues. These included a desire to get participation right first of all and then to look at empowerment, and to ensure tenants and tenant groups are skilled up before undertaking such significant tenant empowerment initiatives, whatever they may be. Other matters highlighted included a need to give due care and consideration to the political nature of housing and the legacy issues that have continued from the formation of the NIHE. Finally some expressed the need for a robust vetting system before handing over any service contract to tenant organisations, whilst there was also a desire to

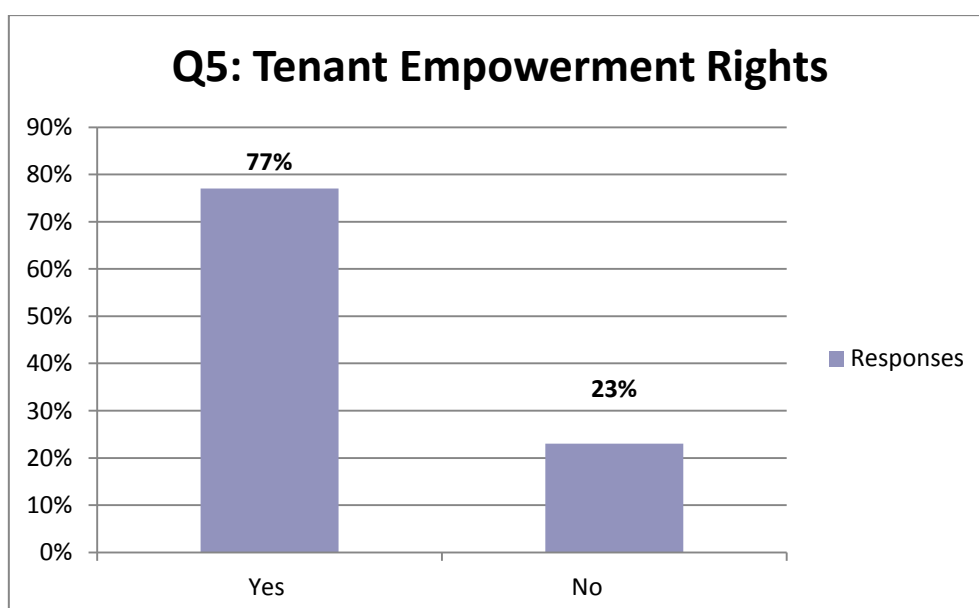
prevent commercial tendering coming in and taking over services to the detriment of local tenant groups or organisations.

A number of respondents, 23%, answered 'no'. Some of these felt that tenant empowerment initiatives were simply unrealistic at this stage of Northern Ireland's development and that the process would not work in single-identity communities. Some felt that there was a risk that funds would be misappropriated and that the most socially excluded would be further marginalised. Others felt that it was too difficult to manage tenants' rights as it was, without adding another level to be contended with, particularly when there was no evidence of any appetite for empowerment rights. Essentially the concerns raised by both sets of respondents were of a similar nature.

The majority of submissions from other sources were also in favour of introducing legislation to support the introduction of tenant empowerment rights but again their answers were qualified. Responses included a desire to provide clear guidelines around tenant empowerment rights, particularly in relation to supported living tenants, and a suggestion that guidelines need to be rigid and enforced. There was also a desire to establish tenant appetite for empowerment and a suggestion that we provide proper support if this initiative is pursued.

Some felt that there was a pre-determined agenda and that we should get participation right first before looking at empowerment. Others felt there was a need for proper safeguards, to have empowerment well regulated and inclusive of all the community, and that any current enterprises that may be in a position to undertake empowerment initiatives would need to expand and develop before entering into such arrangements

A small percentage of respondents were either non committal or answered no with a health warning. These included the need for empowerment to be considered in the potential new operating environment, from a Northern Ireland context, from an equality perspective and depending on what services, if any, are transferred from a Transfer of Undertakings (Protection of Employment) Regulations 2006 perspective (TUPE).



Some of comments relating to the question of empowerment rights were;

- Yes, ultimately this may be achievable and desirable in the longer term, but with a need for caution. It would be important to ensure that Tenant Participation and the strategy, principles and standards are fully implemented and carefully reviewed before taking the next steps towards tenant empowerment. It would also be important to actively consult, inform and gauge tenant's appetite for this in the future
- Whilst in principle we support greater tenant empowerment, we do not believe that legislation should be introduced at this stage. Housing Associations in Northern Ireland are committed to tenant consultation and participation and to creating better places for those in need by investing in communities for current and future generations. However, tenants and tenant Groups have different levels of skills and expertise and will require extensive capacity and community-building to enable them to benefit fully from such empowerment initiatives. We would suggest that this is something that could be kept under review.
- Yes but risk of negative influences in self defined communities might derive increasing influence and control. Should not be assumed to be a good thing unless it can be offered as an incentive to communities which promote values such as social inclusion and diversity
- Yes. Could offer environmental and physical regeneration. It needs proper foundations, to be reviewed by tenants, and we should learn from the NIHE and any historical knowledge of the area in question.

To conclude although the overall views expressed were in favour of introducing legislation to support the introduction of tenant empowerment rights there were many issues raised that need further consideration. We will take forward action on this but will do so cautiously and in particular we will of course seek to reflect concerns within any draft legislation which will be subject to full consultation.

#### QUESTION 6

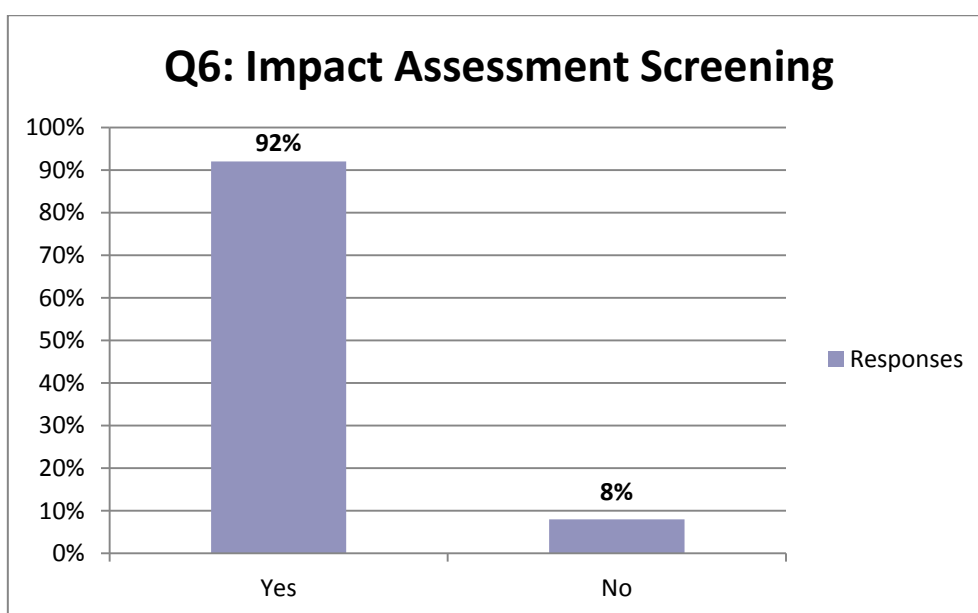
#### Do you agree with the findings of the Impact Assessment Screening Reports?

- Yes
- No

The majority of those that responded, (92%), were in agreement with the findings although there were a small number, (8%), who flagged up a number of concerns; some of the comments submitted are outlined as follows;

- The assessment has considered every conceivable option available and the conclusions are reasonable and fair. My only concern is the viability of empowerment in NI other than in the distant future.

- Areas covered meet requirements of our Housing association and highlight areas that benefit those tenants/groups that ask to be involved at lots or very intensive levels
- Good identification of rural and industrial communities - this is offering all groups of tenants the opportunity to be empowered and voice their opinions and needs. They have the opportunity and can take it or leave it.
- Agreed in principle with the assessments but feel language is complex.
- Believe that the Social inclusion impact assessment should be reviewed in order to assess the impact on homeless people and to ensure they are not disadvantaged as an unintended consequence of the implementation of the proposals contained in the document.



Some of the responses suggested a more explicit reference to the relevant equality legislation in the strategy.

Although some issues were raised the Department is content that they have either mitigated against these or will be addressing them in the follow up action plan which will accompany the strategy, this is currently being developed. However, if any evidence is submitted which highlights specific issues which have not already been considered a further screening exercise will be carried out. If this screening highlights any adverse impacts, against which the Department are unable to mitigate, then a full impact assessment will be conducted.

As part of the policy development cycle, impact assessments are a continuous process to help the department fully think through and understand the consequences of possible and actual Government interventions. This process applies to the development of the policy options, the public consultation process, final decision making and on to the review of implementation of the policy. When or if a review leads to the identification of new policy challenges, perhaps arising

from unintended consequences of the intervention itself, the process of carrying out impact assessments would begin again.

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## OTHER ISSUES

Included within some of the responses were comments on elements of the strategy that will require clarification and which will be part of the action plan that will be developed by the Department in moving forward with implementation of the strategy.

- **Tenant Advocate role** – in the development of this strategy this role was seen as a departmental role focusing on ensuring that the tenant’s voice was heard in all matters related to social housing. The role was seen as one of liaison and having considered comments from respondents and evidence of good practice already in situ the adoption of the term “advocate” will be reconsidered. The scope of the role will be developed as the action plan is developed and consulted on.
- **Housing Policy Panel role** – the role and make-up of the housing policy panel will be developed as part of the action plan to support the strategy;
- **Development of Guidance** - to accompany the strategy and support landlords and tenants groups guidance will be developed;
- **Action taken if regulatory standard not met** – the consultation on the new Regulatory Framework will consider the possibility of introducing additional enforcement powers for the regulator;
- **Participation by non tenants** (e.g. other service users, homeless people etc.) – this issue will be addressed as part of the development of actions under the action plan, the Department will work with representative groups to understand the impact on these groups.
- **Building on existing good practices** – many respondents commented on the good practice that already exists in Northern Ireland and elsewhere in relation to tenants’ participation and articulated the desire to see that shared across the sector – the Department will work with housing professionals across the sector to achieve this.

### 3. CONCLUSION & RECOMMENDATIONS

#### Conclusion

In the main the draft strategy for Tenant Participation has been well received. Although the answers to all the consultation questions showed a positive rating, a lot of responses in relation to tenant empowerment have been heavily qualified. Responses were received from a wide range of sources and the Department is grateful for this as it has afforded the opportunity to consider the strategy from a number of perspectives.

A number of respondents have sought clarification on some issues and these will be developed further as the action plan to support the implementation of the strategy is developed (see page 18).

#### RECOMMENDATIONS

The Department proposes to move ahead with publication of the final strategy which will be subject to following amendments as a result of the feedback on the consultation.

- The Department will require all Social Housing Providers to have a strategy that covers tenant participation either as a standalone document or as part of a wider document;
- In developing the approach to Independent Tenant Support the Department will take account of the existing provision in Northern Ireland;
- The Regulatory Standard will be amended to reflect the full range of social housing providers in northern Ireland;
- The move to introduce legislation in support of tenant empowerment will be carefully researched and subject to full consultation: and
- The strategy will contain reference to appropriate legislation.

## APPENDIX A: COMMUNICATIONS STATISTICS

The consultation document was issued to 382 stakeholders, this included the Departments Consultation list and the Programme's stakeholder list. In addition 22 tenant participation consultation events were held, three of which were open to the public. From this the following responses were submitted;

- 171 responses via survey monkey,
- 35 written responses from organizations (voluntary and community sector, political parties, housing support organizations, resident groups).
- Feedback from events

Further communications included;

- 98 tweets
- 4 Facebook posts
- 31 website articles
- 3 press articles
- 1 stakeholder newsletter article
- 1 You Tube video
- 1 Storify article

**Total: 139 items**

The total audience reached was **483,227**.

APPENDIX B: CONSULTATION QUESTIONNAIRE

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

- By ensuring specific tenant participation strategies are developed by Social Landlords
- By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

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Consultation Question No. 2

Do you think the things we expect of a Social Landlord’s strategic approach to tenant participation are appropriate and fair?

Yes  No

Please explain

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Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes  No

Please provide your reasons

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Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes  No

If not, what more would you include?

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Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes  No

Please provide you reasons

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Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes  No

Please provide you reasons

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Name of Respondent

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E-mail contact

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Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other

Please provide Organisation Name: 

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## APPENDIX C: LIST OF THOSE CONSULTED

**A**

Abbeyfield & Wesley HA  
 Access to Benefits (a2b)  
 ACSONI  
 Active Community Unit (Home office)  
 Advice NI  
 Advice service alliance  
 Africa and Caribbean Community Support  
 Age NI  
 Alpha Housing  
 An Munia Tober  
 Antrim & Newtownabbey Super Council  
 Antrim Borough Council  
 Apex Housing Assoc  
 Archbishop of Armagh & Primate of All  
 Ireland  
 Ards Borough Council  
 Ark Housing Assoc. (NI)  
 Armagh City and District Council  
 Armagh, Banbridge & Craigavon Super  
 Council  
 Assembly Business Office  
 Association of independent Advice centres  
 Association of Baptist Churches in Ireland  
 Armagh, Banbridge & Craigavon Super  
 Council  
 Assembly Business Office  
 Association of independent Advice centres  
 Autism NI  
 Aware

**B**

Baha'i Council for Northern Ireland  
 Ballymena Borough Council  
 Ballymoney Borough Council  
 Baptist Church of Ireland  
 Barnardos  
 Belfast Butterfly Club  
 Belfast Carers Centre  
 Belfast Central Mission  
 Belfast City Council  
 Belfast Education and Library Board  
 Belfast Health & Social Services Trust  
 Belfast Health Development Unit  
 Belfast Healthy Cities  
 Belfast Jewish Community  
 Belfast Law Centre

Belfast Resource Centre for the Unemployed  
 Belfast Super Council  
 Bishop of Down & Connor  
 British Bankers Ass. NI  
 British Deaf Association  
 Bryson House List  
 Business in the Community

**C**

Caleb Foundation  
 Rev David Campton  
 Carafriend  
 Care  
 Carers National Association NI  
 Carrickfergus Borough Council  
 Castlereagh Borough Council  
 Causeway Coast & Glens Super council  
 CBI NI  
 Cedar Foundation  
 Challenge for Youth  
 Chartered Institute of Housing  
 Children in Northern Ireland (CiNI)  
 Children's Law Centre  
 Chinese Chamber of Commerce  
 Chinese Welfare Association  
 CHNI (Council for Homeless NI)  
 Chrysalis Women's Centre  
 Church of Ireland  
 Churches Community Work Alliance  
 Citizens Advice Bureau  
 City Church  
 Clanmil Housing Assoc  
 CO3  
 Coalition on Sexual Orientation  
 Coiste na n-iarchimi  
 Coleraine Borough Council  
 Committee on the Administration of Justice  
 Community Development and Child Health  
 Community Foundation for Northern Ireland  
 Community Places  
 Community Relations Council  
 Community Technical Aid  
 Concordia  
 Confederation of British Industry  
 Confederation of Community Groups  
 Connswater Homes Ltd  
 Construction Employers Fed.

Consumer Council  
 Cookstown District Council  
 Co-operation Ireland  
 CORI NI  
 Council for the Homeless  
 Council for Mortgage Lenders  
 Counteract  
 Covenanter Residential  
 Craigavon Borough Council  
 Craigavon Traveller's Support Committee  
 Craigowen Housing Ass.  
 CREED Ireland  
 Cruse Bereavement Care (NI)

**D**

DARD  
 DCAL  
 DCLG  
 DEL  
 Dept of Education  
 Derry & Strabane Super council  
 Derry City Council  
 Derry Well Woman  
 DETI  
 DFP  
 DHSSPS  
 Diocese of Down and Connor  
 Disability Action  
 DOE  
 DOJ  
 Doury Road Development Group  
 Down District Council  
 Down's Syndrome Association  
 DRD  
 DSD HR  
 Dungannon & South Tyrone Borough Council

**E**

East Belfast Community Development Agency  
 East Down Rural Community Network  
 East Kent Housing  
 Economic Research Institute  
 Elim  
 Embrace NI  
 Employers' Forum on Disability  
 Equality 2000 Ltd  
 Equality Coalition  
 Equality Commission  
 Equality Forum NI  
 Evangelical Alliance  
 Executive Ministers (Junior Ministers)

Expert panel

**F**

Faith Forum  
 Falls Community Council  
 Falls Women's Centre  
 Family Planning Association NI  
 Federation of Master Builders  
 Faith Forum  
 Falls Community Council  
 Fellowship of Independent Methodist Churches  
 Fermanagh & Omagh super council  
 Fermanagh District Council  
 First Key  
 FOCUS  
 Fold Housing Assoc  
 Foyle Friend  
 Fermanagh Women's Network  
 First Division Association  
 Foyle Women's Aid  
 Foyle Women's Information Network  
 Free Presbyterian Church

**G**

Gay and Lesbian Youth NI  
 GEMS Northern Ireland Ltd  
 General Consumer Council  
 Rev Mervyn Gibson  
 Gingerbread  
 Grand Orange Lodge of Ireland  
 Greater Shankill Partnership Board  
 Green Pastures Church  
 Grove Housing Assoc  
 Guide Dogs for the Blind Association

**H**

Habinteg Housing Assoc  
 Harmony Homes  
 Health & Social Care Trust  
 Health and Social Care Board Headquarters  
 HEARTH  
 Helm Housing  
 Housing Community Network  
 Housing Council Secretary  
 Housing Council Chairperson  
 Housing Rights Service  
 Humanist Association of Northern Ireland

**I**

IMTAC  
 Independent Methodists

Indian Community Centre  
Information Commissioner's Office  
Invest NI  
Irish Congress of Trade Unions

**K**

Knights of Columbanus

**L**

Land & Property Services  
Landlords Assoc NI  
Larne Borough Council  
Law Society  
Law Centre (NI)  
Lenadoon Community Forum  
Lesbian Line  
Library (Assembly)  
Limavady District Council  
Link Family and Community Centre  
Lisburn & Castlereagh Super council  
Lisburn City Council  
Local Government Staff Commission  
Local Govt Reform

**M**

Magherafelt District Council  
Magherafelt Women's Groups  
Very Reverend Michael Mc Ginnity  
Men's Action Network (MAN)  
Men's Aid  
Mencap  
Methodist Church in Ireland  
Mid and East Antrim Super council  
Mid Ulster super council  
Mid-Ulster Women's Network  
Mindwise  
MLA's  
Monkstown Community Forum  
Moyle District Council  
Multi-Cultural Resource Centre

**N**

National Association of Pension Funds  
National Children's Bureau NI  
National Federation of ALMOS  
National House Building Council  
Newington Housing Association  
Newry & Mourne District Council  
Newry , Mourne & Down Super council  
Newry & Mourne Senior Citizen's Consortium  
Newry and Mourne Women  
Newtownabbey Borough Council

Newtownabbey Senior Citizen's Forum  
NI Co-Ownership Housing Association Ltd  
NI Human Rights Commission  
NI Private Tenants  
NI Private Tenants Association  
NIACRO  
NICEM  
NICVA  
NIFHA  
NIHE  
NIHE Disability Forum  
NILGA  
NIPSA  
Non-subscribing Presbyterian Church  
North Belfast  
North Belfast Partnership Board  
North Down and Ards Super council  
North Down Borough Council  
North Eastern Education and Library Board  
North West Community Network  
North West Forum of People with Disabilities  
Northern HSCT  
Northern Ireland African Cultural Centre  
Northern Ireland Anti-Poverty Network  
Northern Ireland Association for Mental Health  
NI Commissioner for Children & Young People  
NI Community of Refugees & Asylum seekers  
Northern Ireland Dyslexia Association  
Northern Ireland Gay Rights Association  
Northern Ireland Human Rights Commission  
Northern Ireland Inter -Faith Forum  
Northern Ireland Islamic Centre  
Northern Ireland Political Parties  
Northern Ireland Statistics and Research Agency (NISRA)  
Northern Ireland Union of Supported Employment  
Northern Ireland Women's Aid Federation  
Northern Ireland Women's European Platform  
Northern Ireland Youth Forum  
NSPCC  
NUS/USI Northern Ireland Student Centre

**O**

Oaklee Homes Group  
ÒChallengeÓ  
OFM/DFM

Omagh District Council  
Omagh Women's Area Network  
Open Door Housing Ass

**P**

Parents Advice Centre  
Placeshapers  
PlayBoard  
POBAL  
Polish Association NI  
Poplar HARCA /  
Praxis Care  
Presbyterian Church in Ireland  
Press for Change  
PSNI

**Q**

Quaker Service  
Queens University

**R**

Rainbow Project  
Rating Policy Division  
Reformed Presbyterian Church  
(Knockbracken)  
Regulation Quality Improvement Authority  
Relate NI  
Rent Officer for Northern Ireland  
RICS (Royal Institute of Chartered surveyors)  
Royal Black Institution  
Royal National Institute for the Blind  
Royal National Institute for the Deaf  
Rural Community Network  
Rural Development Council  
Rural Housing Association  
Rural Support

**S**

Sai Pak Chinese Community Association  
Save the Children  
SCNI / CHCN  
Scottish Housing Regulator  
SDC  
SE Health & Social care Trust  
SEEDS  
Sense NI  
Shelter (Northern Ireland)  
SIB  
Sikh Cultural Centre  
Simon Community  
Skainos  
Social Economy Agency  
SOLACE / Banbridge District Council

South Belfast Partnership Board  
South Eastern Education and Library Board  
Southern Education and Library Board  
South Ulster Housing Association Ltd  
South West Belfast Community Forum  
Southern HSCT  
Speaker  
Sperrin Lakeland Senior Citizens' Consortium  
SSA  
St Matthews Housing Association Ltd  
Staff Commissions for Education and Library  
Boards  
STEP (South Tyrone Empowerment Project)  
Strabane District Council

**T**

Trinity Housing (NI)

**U**

Ulidia Housing Association  
Ulster Architectural Heritage Society  
Ulster People's College  
Ulster Scots Agency  
Ulster Scots Community Network  
ULTACH  
UNISON  
UNITE  
UU Housing Dept

**V**

Volunteer Now  
Volunteer Development Agency

**W**

Welfare Reform  
Welsh Housing Regulator  
Wesley Housing Association  
West Belfast Economic Forum  
West Belfast Partnership Board  
Westbourne Community Presbyterian Church  
Western Education and Library Board  
Western HSCT  
Dr Robert Wilson  
Women into Politics  
Women's Centre  
Women's Forum  
Women's Information Group  
Women's Resource and Development Agency  
Women's Support Network  
Worker's Educational Association

**Y**

Youth Council for NI  
Youthnet

## APPENDIX D: ORGANISATIONS SUBMITTING WRITTEN RESPONSES

Apex Supported Living Department  
Ballymurphy Residents Association  
Ballynahinch Support Group  
Beechmount Residents Association  
Central Housing Forum (HCN)  
Chartered Institute of Housing (CIH)  
Clonard Residents Association  
Covenanter  
Disability Action  
Equality Commission for Northern Ireland  
Falls Residents Association  
Glencolin Residents Association  
HELM HA  
Housing Rights Service  
New Barnsley Residents Association  
NIHE Disability Forum  
Northern Ireland Association for the Care & Resettlement of Offenders (NIACRO)  
Northern Ireland Federation of Housing Associations (NIFHA)  
Northern Ireland Housing Executive (NIHE)  
Northern Ireland Housing Council (NIHC)  
Roden Street Community Development Group  
Sinn Fein  
Sliabh Dubh Residents Association  
Slievban Residents Association  
Supporting Communities Northern Ireland (SCNI)  
Social & Democratic Labour Party (SDLP)  
South Eastern Health & Social Care trust  
Southern Health & Social care trust  
Springhill/Springmadden Residents Association  
St James Forum  
St Marys Community Group  
Upper Andersonstown Residents Group  
Upper Andersonstown Community Forum  
Upper Springfield Federation of Residents Associations  
Whiterock/Westrock Residents Association